

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 22-20275-CR-MARTINEZ

UNITED STATES OF AMERICA,

Plaintiff,

vs.

LAVON MOSS, JR.,

Defendant.

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**UNOPPOSED MOTION TO CONTINUE TRIAL**

Defendant, Lavon Moss, through undersigned counsel, respectfully moves for a 30-day continuance of the trial of this case currently set for the two-week trial period commencing September 12, 2022. In support thereof, he states as follows:

This is the first request for a continuance in this matter. Undersigned counsel was permanently assigned to this case on July 13, 2022 and discovery was timely produced on August 3, 2022. The parties had been conferring regarding a protective order in the case prior undersigned counsel producing the discovery in the case to the defendant. An Amended Protective Order was entered in this case on August 4, 2022, and counsel then sent discovery as provided for therein to Mr. Moss and made additional discovery available for review at her office. An additional discovery production was received on August 16, 2022, consisting of Mr. Moss's recorded statement. Counsel and Mr. Moss have been reviewing discovery in the case and the parties have been discussing a resolution of the case.

The parties are working diligently to resolve the matter. Undersigned counsel requires time to review the discovery, investigate the case, meet in person with Mr. Moss and otherwise work toward the best resolution of the case.

Undersigned counsel will be out of the country on annual leave from September 9 through September 18, 2022 and therefore requests additional time to meet with Mr. Moss and resolve the case.

Therefore, the defense is requesting a continuance of 30 days of the trial period and a concomitant continuance of the pre-trial motions deadlines.

Assistant United States Attorney Yara Dodin does not object to the requested continuance.

WHEREFORE, the defendant respectfully requests this Court continue the trial of this case for at least thirty days.

Respectfully Submitted,

**MICHAEL CARUSO**  
**FEDERAL PUBLIC DEFENDER**

By: /s/ Aimee Ferrer  
Aimee Ferrer  
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**CERTIFICATE OF SERVICE**

I HEREBY certify that on **September 1, 2022**, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

By: s/ Aimee Ferrer